

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

Civil Action No. 1:12-cv-03823-PGG

BRUCE P. KRIEGMAN
as Chapter 11 Trustee for LLS America,

Plaintiff,

v.

ALEX MIRROW and SAVE IT, LLC,

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO NON-PARTY FATIMA MIRROW'S MOTION TO QUASH
PLAINTIFF'S *EX PARTE* ISSUANCE OF SUBPOENAS**

Plaintiff, Bruce P. Kriegman, as Chapter 11 Trustee for LLS America (the "Trustee"), by his attorney, Bruce E. Rohde of Campbell Killin Brittan and Ray, LLC, respectfully requests a two-week extension of time to file his Response to Non-Party Fatima Mirrow's Motion To Quash Plaintiff's *Ex Parte* Issuance of Subpoenas ("Motion"), and in support, states as follows:

CERTIFICATION

The Trustee's counsel conferred with counsel for Non-Party, Fatima Mirrow, via email regarding this Motion. Counsel for Ms. Mirrow has stated that he has no objection to the extension requested herein.

MOTION

1. On April 15, 2021, on the Trustee's Motion for Issuance of Subpoenas, the U.S. District Court for the District of Colorado Court issued Subpoenas to Ms. Fatima Mirrow (the

“Subpoenas”) requiring her to produce certain documents and then appear for a deposition.

2. Ms. Mirrow was personally served with the Subpoenas on April 16, 2021.
3. On April 29, 2012, Ms. Mirrow filed a Motion to Quash the Subpoenas (“Motion”). While the Certificate of Service indicates the undersigned was served with the Motion, he did not receive it until today, May 18, 2021, when Ms. Mirrow’s counsel sent him an electronic copy (in response an email the undersigned sent to him yesterday asking when Ms. Mirrow could appear for a deposition).
4. Pursuant to Fed.R.Civ.P. 7.1(d), the Trustee’s Response to the Motion is presently due on May 20, 2021.
5. The undersigned counsel for the Trustee was on a two-week vacation from April 29, 2021 to May 17, 2021, and has other matters to attend to within the next two weeks, including the preparation of two other responsive pleadings in this matter and four responsive pleadings and witness and exhibit lists and jury instructions in: *Kazi v KFC US, LLC*; United States District Court for the District of Colorado; Civil Action No. 19-cv-03300-RBJ, which is set to go to trial beginning June 28, 2021.
6. Therefore, the Trustee respectfully requests a two-week extension to file his Reply.

WHEREFORE, Plaintiff requests an extension of time to file his Response to the Motion to Quash up to and including June 3, 2021.

[SIGNATURE PAGE FOLLOWS]

DATED this 19th day of May, 2021.

Campbell Killin Brittan & Ray, LLC

By: /s/ Bruce E. Rohde
Bruce E. Rohde, #11465
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Attorneys for Plaintiff Bruce P. Kriegman,
as Chapter 11 Trustee for LLS America.

CERTIFICATE OF SERVICE

I hereby certify that on May 19th, 2021, a true and correct copy of the foregoing **PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO NON-PARTY FATIMA MIRROW'S MOTION TO QUASH PLAINTIFF'S EX PARTE ISSUANCE OF SUBPOENAS** was served via United States Mail, addressed to the following:

Jeffrey M. Villanueva
Jeffrey M. Villanueva, P.C.
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Attorney for Fatima Mirrow.

s/ Samantha Merrick
Samantha Merrick